

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
(CAMDEN VICINAGE)**

NICHOLAS DIBENEDETTO and EVELYN DIBENEDETTO, <i>Plaintiffs,</i> v. BALLY’S PARK PLACE LLC d/b/a BALLY’S ATLANTIC CITY; and ABC CORPORATIONS (1-10), <i>Defendants.</i>	Civil Action No. 1:21-cv-16547
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NOTICE OF REMOVAL

Defendant, Bally’s Park Place, LLC (improperly designated as “Bally’s Park Place LLC d/b/a Bally’s Atlantic City”), hereby gives notice to the Court, pursuant to 28 U.S.C. §1446(b) of the removal of this action which has been pending in the Superior Court of New Jersey, Law Division, Atlantic County under Docket No.: ATL-L-2004-21 (the State Action). The removal to this Court, Camden Vicinage, is proper for the reasons set forth below:

1. Plaintiffs, Nicholas DiBenedetto and Evelyn Benedetto, are citizens of the State of New Jersey with a principal residence in Middlesex County, New Jersey. Defendant, Bally’s Park Place, LLC, improperly designated as “Bally’s Park Place LLC d/b/a Bally’s Atlantic City”, is a limited liability company with a single member, CEOC, LLC, which, itself, is a limited liability company with a single member Caesars Resort Collection, LLC, which, itself, is a limited liability company with a single member, Caesars Growth Partners, LLC, which, itself, is a limited liability company with a single member, Caesars Holdings, Inc., which is a Delaware corporation, with its principal place of business located in Nevada.

2. This matter was originally filed in the Superior Court, Law Division, Atlantic County bearing docket number ATL-L-2004-21. **See Plaintiffs' Complaint, attached as Exhibit "A".**

3. Plaintiffs filed their Complaint against the Defendants to recover for injuries alleged to have been suffered as a result of an incident that occurred on July 4, 2019, at 1900 Pacific Avenue, Atlantic City, New Jersey.

4. This is a civil action of which the United States District Court has original jurisdiction pursuant to 28 U.S.C. §1332(a)(1) (diversity).

5. Pursuant to U.S.C. §1332(c)(1), a corporation shall be deemed to be a citizen of every State and foreign State by which it has been incorporated and the State or foreign State where it has its principal place of business.

6. This entire matter is one which may be removed to this Court by virtue of the provisions of 28 U.S.C. §1441(a) and in accordance with 28 U.S.C. §1446.

7. This court is one of proper venue pursuant to 28 U.S.C. §1391(a)(2) because the alleged violation occurred in the State of New Jersey.

8. Venue in the Camden vicinage is proper as the incident occurred at the Bally's property located in Atlantic City, New Jersey.

9. Pursuant to 28 U.S.C. §1446(d), a copy of this Notice of Removal has been filed with the Clerk of the Superior Court of New Jersey, Law Division, Atlantic County and written notice given to the Plaintiff.

10. This Court has original jurisdiction pursuant to 28 U.S.C. Section 1332 and, upon information and belief, the amount in controversy exceeds seventy-five thousand dollars (\$75,000.00), exclusive of interest and costs.

11. Since the filing of Defendant's Answer in State Court, Plaintiffs have served a Statement of Damages alleging that the injuries being claimed are worth \$400,000.00. **See Plaintiffs' Statement of Damages, attached as Exhibit "B".**

18. Pursuant to 28 U.S.C. 1446, a party may seek to remove a case after receiving information confirming that the damages being alleged are in excess of seventy-five thousand dollars (\$75,000.00), exclusive of interest and costs.

WHEREAS, the Defendant, Bally's Park Place, LLC, respectfully gives notice to this Court with the request for the removal of the State Action in the Superior Court of New Jersey, Law Division, Atlantic County, to the United States District Court of New Jersey, Camden Vicinage.

Respectfully submitted,

SWEENEY & SHEEHAN

By: /s/ Brian M. Dib, Esquire
Giacomo F. Gattuso, Esquire
Brian M. Dib, Esquire
Attorneys for Defendant,
Bally's Park Place, LLC

Date: September 3, 2021

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
(CAMDEN VICINAGE)**

NICHOLAS DIBENEDETTO and EVELYN DIBENEDETTO, <i>Plaintiffs,</i> v. BALLY'S PARK PLACE LLC d/b/a BALLY'S ATLANTIC CITY; and ABC CORPORATIONS (1-10), <i>Defendants.</i>	Civil Action No. 1:21-cv-16547
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CERTIFICATE OF FILING AND SERVICE

The within *Notice of Filing and Notice of Removal* by Defendant, Bally's Park Place, LLC, improperly designated as Bally's Park Place LLC d/b/a Bally's Atlantic City, has been filed *via electronic filing* this date with the Clerk of the Court, United States District Court for the District of New Jersey, Camden Vicinage.

Respectfully submitted,

SWEENEY & SHEEHAN

By: /s/ Brian M. Dib, Esquire

Giacomo F. Gattuso, Esquire
Brian M. Dib, Esquire
Attorneys for Defendant,
Bally's Park Place, LLC

Date: September 3, 2021

PROOF OF SERVICE

On September 3, 2021, I, the undersigned, served the following parties via e-filing & U.S. First Class Mail:

U.S. First Class Mail

Michelle Smith, Clerk
Superior Court of New Jersey
Law Division, Hughes Justice Complex
25 W. Market Street, CN 971
Trenton, New Jersey 08625

Clerk
Atlantic County Superior Court
Atlantic County Superior Court
1201 Bacharach Boulevard
Atlantic City, NJ 08401

Richard A. Stoloff, Esquire
Law Offices of Richard A. Stoloff
605 New Road
Linwood, New Jersey 08221

the following document:

**NOTICE OF FILING AND NOTICE OF REMOVAL BY
DEFENDANT, BALLY'S PARK PLACE, IMPROPERLY DESIGNATED AS
BALLY'S PARK PLACE LLC d/b/a BALLY'S ATLANTIC CITY**

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Respectfully submitted,

SWEENEY & SHEEHAN

By: /s/ Brian M. Dib, Esquire

Giacomo F. Gattuso, Esquire
Brian M. Dib, Esquire
Attorneys for Defendant,
Bally's Park Place, LLC

Date: September 3, 2021

CE-1116

SWEENEY & SHEEHAN

Sentry Office Plaza

216 Haddon Avenue, Suite 300

Westmont, New Jersey 08108

(856) 869-5600 Telephone

(856) 869-5605 Facsimile

Frank Gattuso, Esquire

Attorney I.D. No.: 002291999

Brian M. Dib, Esquire

Attorney I.D. No.: 018402012

Attorneys for Defendant, Bally's Park Place, LLC,

improperly designated as Bally's Park Place LLC d/b/a Bally's Atlantic City

NICHOLAS DIBENEDETTO and EVELYN DIBENEDETTO, <i>Plaintiffs,</i> v. BALLY'S PARK PLACE LLC d/b/a BALLY'S ATLANTIC CITY; and ABC CORPORATIONS (1-10), <i>Defendants.</i>	Civil Action No. 1:21-cv-16547
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NOTICE OF FILING OF NOTICE OF REMOVAL OF CIVIL ACTION TO
UNITED STATES DISTRICT FOR THE DISTRICT OF NEW JERSEY
(CAMDEN VICINAGE)

TO: Clerk

Atlantic County Superior Court

1201 Bacharach Boulevard

Atlantic City, NJ 08401

WITH NOTICE TO:

Michelle Smith, Clerk

Superior Court of New Jersey

Law Division, Hughes Justice Complex

25 W. Market Street, CN 971

Trenton, New Jersey 08625

Office of the Clerk

United States District Court for the District of New Jersey

Mitchell H. Cohen Building, Room 1050

400 Cooper Street

Camden, NJ 08101

Richard A. Stoloff, Esquire
Law Offices of Richard A. Stoloff
605 New Road
Linwood, New Jersey 08221

PLEASE TAKE NOTICE that a Notice of Removal by Defendant, Bally's Park Place, LLC, improperly designated as Bally's Park Place LLC d/b/a Bally's Atlantic City, of this action from the Superior Court of New Jersey, Law Division, Atlantic County, Docket No. ATL-L-2004-21, to the United States District Court for the District of New Jersey (Camden Vicinage) (a copy of the Notice of Removal is attached hereto) was filed on September 3, 2021, in the United States District Court of New Jersey, Camden Vicinage.

Respectfully submitted,

SWEENEY & SHEEHAN

By: /s/ Brian M. Dib, Esquire
Giacomo F. Gattuso, Esquire
Brian M. Dib, Esquire
Attorneys for Defendant,
Bally's Park Place, LLC

Date: September 3, 2021

EXHIBIT ‘A’

JUN 29 2021

LAW OFFICES OF RICHARD A. STOLOFF605 New Road
Linwood, NJ 08221

(609) 601-2233

BY: RICHARD A. STOLOFF

Attorney ID#: 044951991

ATTORNEY FOR PLAINTIFFS

NICHOLAS DiBENEDETTO &
EVELYN DiBENEDETTO (h/w)
Plaintiffs

vs.

BALLY'S PARK PLACE LLC
d/b/a BALLY'S ATLANTIC CITY,
and ABC CORPORATIONS (1-10)

Defendants.

SUPERIOR COURT OF NEW JERSEY
ATLANTIC COUNTY
LAW DIVISION

DOCKET NO: ATL-L-002004-21

SUMMONS

The State of New Jersey, to the above-named Defendant(s):

**BALLY'S PARK PLACE, LLC
d/b/a BALLY'S ATLANTIC CITY**

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiffs attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$135 and completed Case Information Statement) if you want the court to hear your defense. If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment. If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

*/s/ Michelle Smith*Michelle M. Smith,
Clerk of the Superior Court

DATED: June 28, 2021

Name of Defendant to be served:

Address for Service:

BALLY'S PARK PLACE LLC

1900 Pacific Avenue, Atlantic City, NJ 08401

**DIRECTORY OF SUPERIOR COURT DEPUTY CLERK'S OFFICES
COUNTY LAWYER REFERRAL AND LEGAL SERVICES OFFICES**

ATLANTIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., First Fl.
Atlantic City, NJ 08401

LAWYER REFERRAL

(609) 345-3444

LEGAL SERVICES

(609) 348-4200

BERGEN COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Room 115
Justice Center, 10 Main St.
Hackensack, NJ 07601

LAWYER REFERRAL

(201) 488-0044

LEGAL SERVICES

(201) 487-2166

BURLINGTON COUNTY:

Deputy Clerk of the Superior Court
Central Processing Office
Attn: Judicial Intake
First Fl., Courts Facility
49 Rancocas Rd.
Mt. Holly, NJ 08060

LAWYER REFERRAL

(609) 261-4862

LEGAL SERVICES

(800) 496-4570

CAMDEN COUNTY:

Deputy Clerk of the Superior Court
Civil Processing Office
Hall of Justice
1st Fl., Suite 150
101 South 5th Street
Camden, NJ 08103

LAWYER REFERRAL

(856) 964-4520

LEGAL SERVICES

(856) 964-2010

CAPE MAY COUNTY:

Deputy Clerk of the Superior Court
9 N. Main Street
Cape May Court House, NJ 08210

LAWYER REFERRAL

(609) 463-0313

LEGAL SERVICES

(609) 465-3001

CUMBERLAND COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
Broad & Fayette Sts.
P.O. Box 10
Bridgeton, NJ 08302

LAWYER REFERRAL

(856) 692-6207

LEGAL SERVICES

(856) 451-0003

ESSEX COUNTY:

Deputy Clerk of the Superior Court
Civil Customer Service
Hall of Records, Room 201
465 Dr. Martin Luther King Jr. Blvd.
Newark, NJ 07102

LAWYER REFERRAL

(973) 622-6204

LEGAL SERVICES

(973) 624-4500

Directory of Superior Court Deputy Clerk's Offices
County Lawyer Referral and Legal Services Offices

GLOUCESTER COUNTY:
Deputy Clerk of the Superior Court
Civil Case Management Office
Attn: Intake
First Fl., Court House
1 North Broad Street, P.O. Box 750
Woodbury, NJ 08096

LAWYER REFERRAL
(856) 848-4589
LEGAL SERVICES
(856) 848-5360

HUDSON COUNTY:
Deputy Clerk of the Superior Court
Superior Court, Civil Records Dept.
Brennan Court House--1st Floor
583 Newark Ave.
Jersey City, NJ 07306

LAWYER REFERRAL
(201) 798-2727
LEGAL SERVICES
(201) 792-6363

HUNTERDON COUNTY:
Deputy Clerk of the Superior Court
Civil Division
65 Park Avenue
Flemington, NJ 08822

LAWYER REFERRAL
(908) 735-2611
LEGAL SERVICES
(908) 782-7979

MERCER COUNTY:
Deputy Clerk of the Superior Court
Local Filing Office, Courthouse
175 S. Broad Street, P.O. Box 8068
Trenton, NJ 08650

LAWYER REFERRAL
(609) 585-6200
LEGAL SERVICES
(609) 695-6249

MIDDLESEX COUNTY:
Deputy Clerk of the Superior Court,
Middlesex Vicinage
2nd Floor - Tower
56 Paterson Street, P.O. Box 2633
New Brunswick, NJ 08903-2633

LAWYER REFERRAL
(732) 828-0053
LEGAL SERVICES
(732) 249-7600

MONMOUTH COUNTY:
Deputy Clerk of the Superior Court
Court House
71 Monument Park
P.O. Box 1269
Freehold, NJ 07728-1269

LAWYER REFERRAL
(732) 431-5544
LEGAL SERVICES
(732) 866-0020

MORRIS COUNTY:
Morris County Courthouse
Civil Division
Washington and Court Streets
P. O. Box 910
Morristown, NJ 07963-0910

LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 285-6911

OCEAN COUNTY:
Deputy Clerk of the Superior Court
Court House, Room 119
118 Washington Street
Toms River, NJ 08754

LAWYER REFERRAL
(732) 240-3666
LEGAL SERVICES
(732) 341-2727

Directory of Superior Court Deputy Clerk's Offices
County Lawyer Referral and Legal Services Offices

PASSAIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division
Court House
77 Hamilton Street
Paterson, NJ 07505

LAWYER REFERRAL

(973) 278-9223

LEGAL SERVICES

(973) 523-2900

SALEM COUNTY:

Deputy Clerk of the Superior Court
92 Market Street
P.O. Box 29
Salem, NJ 08079

LAWYER REFERRAL

(856) 678-8363

LEGAL SERVICES

(856) 451-0003

SOMERSET COUNTY:

Deputy Clerk of the Superior Court
Civil Division
P.O. Box 3000
40 North Bridge Street
Somerville, N.J. 08876

LAWYER REFERRAL

(908) 685-2323

LEGAL SERVICES

(908) 231-0840

SUSSEX COUNTY:

Deputy Clerk of the Superior Court
Sussex County Judicial Center
43-47 High Street
Newton, NJ 07860

LAWYER REFERRAL

(973) 267-5882

LEGAL SERVICES

(973) 383-7400

UNION COUNTY:

Deputy Clerk of the Superior Court
1st Fl., Court House
2 Broad Street
Elizabeth, NJ 07207-6073

LAWYER REFERRAL

(908) 353-4715

LEGAL SERVICES

(908) 354-4340

WARREN COUNTY:

Deputy Clerk of the Superior Court
Civil Division Office
Court House
413 Second Street
Belvidere, NJ 07823-1500

LAWYER REFERRAL

(973) 267-5882

LEGAL SERVICES

(908) 475-2010

LAW OFFICES OF RICHARD A. STOLOFF

605 New Road

Linwood, NJ 08221

(609) 601-2233

BY: RICHARD A. STOLOFF

Attorney ID#: 044951991

ATTORNEY FOR PLAINTIFFS

NICHOLAS DiBENEDETTO &
EVELYN DiBENEDETTO (h/w)
Plaintiffs

vs.

BALLY'S PARK PLACE LLC
d/b/a BALLY'S ATLANTIC CITY,
and ABC CORPORATIONS (1-10)

Defendants.

SUPERIOR COURT OF NEW JERSEY
ATLANTIC COUNTY
LAW DIVISION

DOCKET NO:

COMPLAINT

Plaintiffs, Nicholas DiBenedetto & Evelyn DiBenedetto residing at 106 Madison Avenue,
Old Bridge, Middlesex County, New Jersey, by way of Complaint against the defendants, say:

COUNT I

1. Defendant, Bally's Park Place, LLC, d/b/a Bally's Atlantic City (hereinafter referred to as "Bally's"), upon information and belief, is a New Jersey Corporation qualified to do business in the State of New Jersey with a registered office at 2711 Centerville Road, Suite 4010, New Castle, DE. At all times material hereto, the aforementioned Defendant, owned and/or possessed and/or operated and/or was in exclusive control of the establishment known as "Bally's", and who, at all times material hereto owned and/or operated and/or possessed and/or leased and/or was in exclusive control of and/or was responsible for the maintenance, upkeep, and safety, of the premises located at 1900 Pacific Avenue, Atlantic City, New Jersey 08401.

2. ABC Corporations (1-10), fictitious names, representing a corporation, partnership, sole proprietorship and/or business entity whose identity cannot reasonably be ascertained after reasonable investigation at this time and who at all times material hereto was responsible for the maintenance, upkeep, and safety, of the premises known as “Bally’s” located at 1900 Pacific Avenue, Atlantic City, New Jersey 08401.

3. At all times material hereto defendants, were acting individually and/or with permission of and/or as the agent(s), employee(s), worker(s), contractor(s), or assign(s).

4. On or about July 4, 2019, plaintiff, Nicholas DiBenedetto, was a guest and lawfully on the premises of “Bally’s”, located at 1900 Pacific Avenue, Atlantic City, New Jersey 08401, in the City of Atlantic City, County of Atlantic and State of New Jersey and while stepping down into a hot tub in the area known as Bally’s Spa, plaintiff was caused to suffer a laceration of his foot due to a sharp edge and a defectively placed handrail, causing injuries to plaintiff, Nicholas DiBenedetto.

5. The aforesaid occurrences and injuries, which plaintiff was caused to suffer as a proximate result thereof, were caused by the negligence, carelessness, and recklessness of the defendants as aforesaid in that the defendants, by and through their agents, servants, workers and/or employees:

- a. Carelessly and negligently maintained the said steps by allowing to exist dangerous and unsafe conditions in the form of a sharp edge/object of the steps and a defectively placed handrail inside the hot tub, presenting an unreasonable danger of which defendants knew or should have known, to plaintiff and/or other patrons;
- b. Knew or should have known of the dangerous condition of the said steps and handrail, and the dangerous conditions it caused, but nevertheless

permitted the premises to remain in an unreasonably unsafe, unsuitable, and dangerous condition;

- c. Failed to use due care and to implore reasonable skills in the performance of their duty in their care for plaintiff, Nicholas DiBenedetto;
- d. Failed to exercise the judgment, care, and skill of reasonable persons under similar circumstances;
- e. Failed to use reasonable prudence or care in maintaining the steps and handrail in a safe condition;
- f. Failed to warn and/or properly warn and/or adequately warn plaintiff of said dangerous conditions;
- g. Failed to exercise reasonable care to inspect and/or discover and/or remedy and/or repair and/or warn plaintiff of the dangerous conditions as the aforesaid;
- h. Unreasonably exposed plaintiff to a dangerous condition;
- i. Had actual and/or constructive notice or knowledge of the dangerous conditions and failed to correct, remedy, repair and/or warn plaintiff of same;
- j. Failed to correct, remedy, repair and/or eliminate the said dangerous conditions;
- k. Maintained the said steps and handrail in an unreasonably dangerous, unsuitable and/or unsafe condition.

9. As a direct and proximate result of defendants' negligence, carelessness and recklessness as aforesaid, plaintiff, Nicholas DiBenedetto, was caused to suffer and sustain severe, permanent

and painful bodily injuries, some or all of which may be permanent, some or all of which result in severe and serious injury to a bodily function and/or system, causing him to suffer and continue to suffer disability, great pain and embarrassment, all of which has required, and will continue to require, the expense of large sums of money for medical care and treatment and has and will prevent him from attending to business, employment and duties, to his financial loss, all of which has resulted in a loss of life's pleasures.

WHEREFORE, plaintiff, Nicholas DiBenedetto demands judgment in his favor and against defendants, Bally's Park Place, LLC, d/b/a Bally's Atlantic City, and ABC Corporation (1-20) individually, jointly, severally, and, in the alternative, for damages, together with cost of suit.

COUNT II

1. Plaintiff, Evelyn DiBenedetto, incorporates Count I of plaintiffs' complaint are incorporated herein by reference as though set forth more fully at length.

2. As a direct result of the defendants' conduct as aforesaid, plaintiff, Evelyn DiBenedetto, has been and in the future will continue to be deprived of the affection, care and society of her husband, plaintiff, Nicholas DiBenedetto, and has suffered a loss of consortium.

WHEREFORE, plaintiff, Evelyn DiBenedetto demands judgment in her favor and against defendants, Bally's Park Place, LLC, d/b/a Bally's Atlantic City, and ABC Corporation (1-20) individually, jointly, severally, and, in the alternative, for damages, together with cost of suit.

LAW OFFICES OF RICHARD A. STOLOFF

Date: June 25, 2021

BY /s/ Richard A. Stoloff
Richard A. Stoloff, Attorney for Plaintiff

DEMAND FOR TRIAL BY JURY

Plaintiff hereby demands a trial by jury as to all issues.

LAW OFFICES OF RICHARD A. STOLOFF
BY /s/ Richard A. Stoloff
Richard A. Stoloff, Attorney for Plaintiff

NOTICE PURSUANT TO RULE 1:7-1

Pursuant to Rule 1:7-1, the plaintiff may, at the time of trial, suggest to the trier of fact, with respect to any element of damages, that unliquidated damages be calculated on a time-unit basis.

LAW OFFICES OF RICHARD A. STOLOFF
BY /s/ Richard A. Stoloff
Richard A. Stoloff, Attorney for Plaintiff

CERTIFICATION PURSUANT TO R. 4:5-1

Following my initial review of this matter, it appears that there are no other actions or arbitrations related to this suit pending or presently contemplated.

LAW OFFICES OF RICHARD A. STOLOFF
BY /s/ Richard A. Stoloff
Richard A. Stoloff, Attorney for Plaintiff

DESIGNATION OF TRIAL COUNSEL

Please take notice that pursuant to R. 4:25-4, Richard A. Stoloff, Esquire, is hereby designated as Trial Counsel.

LAW OFFICES OF RICHARD A. STOLOFF
BY /s/ Richard A. Stoloff
Richard A. Stoloff, Attorney for Plaintiff

DEMAND FOR INTERROGATORIES

Demand is hereby made that Defendants answer Form C and C (2) Interrogatories in accordance with the New Jersey Rules.

Date: June 25, 2021

LAW OFFICES OF RICHARD A. STOLOFF
BY /s/ Richard A. Stoloff
Richard A. Stoloff, Attorney for Plaintiff

Civil Case Information Statement

Case Details: ATLANTIC | Civil Part Docket# L-002004-21

Case Caption: DIBENEDETTO NICHOLAS VS BALLY'S
PARK PLACE, LLC

Case Initiation Date: 06/28/2021

Attorney Name: RICHARD A STOLOFF

Firm Name: RICHARD A. STOLOFF

Address: 605 NEW ROAD

LINWOOD NJ 08221

Phone: 6096012233

Name of Party: PLAINTIFF : DiBENEDETTO, NICHOLAS

Name of Defendant's Primary Insurance Company
(if known): Unknown

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Are sexual abuse claims alleged by: NICHOLAS DIBENEDETTO?
NO

Are sexual abuse claims alleged by: EVELYN DiBENEDETTO? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

06/28/2021

Dated

/s/ RICHARD A STOLOFF

Signed

EXHIBIT ‘B’

605 New Road
Linwood, NJ 08221
(609) 601-2233

ATTORNEY FOR PLAINTIFFS

SUPERIOR COURT OF NEW JERSEY
ATLANTIC COUNTY
LAW DIVISION

DOCKET NO: ATL-L-2004-21

Defendants.

STATEMENT OF DAMAGES

LAW OFFICES OF RICHARD A. STOLOFF

BY: /s/ Richard A. Stoloff

Richard A. Stoloff, Attorney for plaintiff